

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Kimberly A. Roth

) CASE NO. 16-12441-ref
)
Debtor) CHAPTER 13

**NOTICE OF MOTION, RESPONSE DEADLINE
AND HEARING DATE**

Take notice that the debtor, Kimberly Roth has filed a Motion to Modify Plan Post – Confirmation under 11 U.S.C. 1329.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before 4/10/17 you or your attorney must do all of the following:

- (a) File an answer explaining your position at the following location

Clerk/U.S. Bankruptcy Court
Suite 300, The Madison Building
400 Washington Street
Reading, PA 19602

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

- (b) Mail a copy to the Movant's attorney:
Brenna H. Mendelsohn, Esq.
637 Walnut Street
Reading, PA 19601

Also serve the following with a copy of your answer:

Frederick L. Reigle, Esquire
2901 St. Lawrence Avenue
P.O. Box 4010
Reading, PA 19606-4010

2. If you or your attorney do not take the steps described in paragraphs (a) and (b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.
3. A hearing on the motion is scheduled to be held before the Honorable Richard E. Fehling on Tuesday, **April 18, 2017 at 9:30 a.m.** in Courtroom #1, 3rd Floor, The Madison, United States Bankruptcy Court, Reading, Pennsylvania 19601. Unless the court orders otherwise, the hearing, on this contested matter will be an evidentiary hearing at which witnesses may testify with respect to disputed material factual issues in the manner directed by Fed. R. Bankr. P.9014(d).
4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph (b).
5. You may contact the bankruptcy clerk's office at 610-208-5040 to find out whether the hearing has been cancelled because no one filed an answer.

Respectfully submitted:

Dated: March 27, 2017

/s/ Brenna H. Mendelsohn, Esq.
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